

COUNTY OF LOS ANGELES DEPARTMENT OF AUDITOR-CONTROLLER

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ASST. AUDITOR-CONTROLLERS

ROBERT A. DAVIS JOHN NAIMO MARIA M. OMS

September 4, 2008

TO:

Supervisor Yvonne B Burke, Chair

Supervisor Gloria Molina Supervisor Zev Yaroslavsky Supervisor Don Knabe

) endy J. Watanale Supervisor Michael D. Antonovich

Wendy L. Watanabe FROM:

Acting Auditor-Controller

WEST SAN GABRIEL VALLEY CONSORTIUM SUBJECT:

> PARTNERS - EL MONTE CONTRACT REVIEW - A COMMUNITY AND SENIOR SERVICES WORKFORCE INVESTMENT ACT PROGRAM

PROVIDER - FISCAL YEAR 2007-08

We completed a program, fiscal and administrative contract compliance review of West San Gabriel Valley Consortium, dba Career Partners - El Monte (Career Partners - El Monte or Agency), a Community and Senior Services (CSS) Workforce Investment Act (WIA) Program provider.

Background

CSS contracts with Career Partners - El Monte, a private non-profit organization to provide and operate the WIA Youth and Foster Youth Programs. The WIA Youth Program is a comprehensive training and employment program for in-school and out-ofschool youth ages 14 to 21 years old. The WIA Foster Youth Program is a comprehensive training and employment program for pregnant and parenting foster youth and foster youth in need of work experience. The Agency's offices are located in the First and Fifth Districts.

Career Partners - El Monte is compensated on a cost reimbursement basis and has a contract for \$737,614 for Fiscal Year (FY) 2007-08.

Purpose/Methodology

The purpose of the review was to determine whether Career Partners - El Monte complied with its contract terms and appropriately accounted for and spent WIA funds in providing services outlined in their County contract. We also evaluated the adequacy of the Agency's accounting records, internal controls and compliance with federal, State and County guidelines. In addition, we interviewed a number of the Agency's staff and clients.

Results of Review

Overall, Career Partners - El Monte maintained sufficient internal controls over its business operations. However, the Agency billed CSS \$11,470 in unallowable and unsupported expenditures. Specifically, Career Partners - El Monte:

- Billed CSS \$7,356 in FY 2006-07 for expenditures not budgeted in their County contract.
- Billed CSS \$1,965 in direct costs associated with providing services to one individual not eligible to receive program services.
- Billed CSS \$1,322 in expenditures related to another WIA contract.
- Provided \$100 incentives each to four participants prior to the individuals enrolling into the WIA Youth program. The unallowable incentives totaled \$400.
- Billed CSS in FY 2006-07 for \$427 in FY 2007-08 expenditures.

Subsequent to our review, Career Partners - El Monte repaid CSS \$9,105 of the \$11,470 in unallowable and unsupported expenditures.

In addition, the Agency did not always comply with WIA and County contract requirements. For example, the Agency did not:

- Meet all the performance measures as outlined in the FY 2006-07 County contract.
- Discuss the Individual Services Strategy plans with the participants on a monthly basis for four (20%) of the 20 participants sampled.
- Report the participants' program activities on the Job Training Automation system for nine (45%) of the 20 participants sampled.

Details of our review, along with recommendations for corrective action, are attached.

Review of Report

We discussed our report with Career Partners - El Monte and CSS on June 11, 2008. In their attached response, the Agency concurred with our findings and recommendations with one exception. Career Partners - El Monte indicated that the documentation to support the participants' eligibility was provided at the time of our monitoring visit. As indicated in our report, the documentation provided did not adequately support the participants' eligibility under the language and cultural barriers category.

We thank Career Partners - El Monte for their cooperation and assistance during this review. Please call me if you have any questions or your staff may contact Don Chadwick at (626) 293-1102.

WLM:MMO:DC

Attachment

William T Fujioka, Chief Executive Officer
 Cynthia Banks, Director, Department of Community and Senior Services
 Raymond Gibbs, Executive Director, West San Gabriel Valley Consortium dba
 Career Partners – El Monte
 Robert Rizzo, Chairperson, West San Gabriel Valley Consortium dba Career
 Partners – El Monte
 Public Information Office
 Audit Committee

WORKFORCE INVESTMENT ACT PROGRAM WEST SAN GABRIEL VALLEY CONSORTIUM dba CAREER PARTNERS – EL MONTE FISCAL YEAR 2007-08

ELIGIBILITY

Objective

Determine whether West San Gabriel Valley Consortium dba Career Partners – El Monte (Career Partners - El Monte or Agency) provided services to individuals that meet the eligibility requirements of the Workforce Investment Act (WIA).

Verification

We reviewed the case files for 20 (10%) of the 204 participants that received services between July 2007 and January 2008 for documentation to confirm their eligibility for WIA services.

Results

Career Partners - El Monte did not maintain appropriate documentation to support the eligibility of four (20%) of the 20 participants sampled. Specifically, Career Partners - El Monte did not maintain documentation to support the participants' youth barriers as required by WIA regulations. Career Partners - El Monte billed Community and Senior Services (CSS) \$11,495 in direct costs associated with providing services to the four ineligible individuals. The Agency also may have billed CSS for indirect services for the ineligible individuals, such as staff time. However, we were unable to determine the amount.

Subsequent to our review, Career Partners - El Monte provided documentation to support the eligibility of three participants. The direct costs associated with the three participants totaled \$9,530. Career Partners - El Monte also provided additional documentation for the remaining individual. However, the documentation provided did not adequately support the participant's eligibility. Specifically, the participant was enrolled as someone who had cultural and language barriers. However, the participant's statement only indicated that his parents could not read, write or speak English. WIA guidelines require a written referral from a counselor or a parent, a doctor's certification or assessment evaluation to adequately support the participant's eligibility under the language and cultural barriers category.

Recommendations

Career Partners - El Monte management:

- 1. Repay CSS \$1,965 (\$11,495 \$9,530) and any other costs incurred on behalf of the ineligible participant.
- 2. Ensure that staff obtain appropriate documentation from the participants to determine the participants' eligibility for program services prior to enrollment.

BILLED SERVICES/CLIENT VERIFICATION

Objective

Determine whether the Agency provided the services in accordance with the County contract and WIA guidelines. In addition, determine whether the participants received the billed services.

Verification

We reviewed the documentation contained in the case files for 20 (10%) participants that received services during July 2007 through January 2008. We also interviewed nine participants/guardians.

Results

The nine participants/guardians interviewed stated that the services they received met their expectations. However, Career Partners - El Monte did not always comply with WIA and County contract requirements. Specifically, Career Partners - El Monte did not:

- Discuss the Individual Service Strategy (ISS) plans with the participants on a monthly basis for four (20%) of the 20 participants sampled. The ISS is an on going strategy jointly developed by the participant and case manager that identifies the participants' employment goals, appropriate achievement objectives and a combination of services to achieve long term employment.
- Report the participants' program activities, such as leadership training, supportive services and work experience, into the Job Training Automation (JTA) system for nine (45%) of the 20 participants sampled. The JTA system is used by the State of California Employment Development Department and the Department of Labor to track WIA participants' activities. This finding was also noted during the prior year's monitoring review.

- Maintain signed Certification and Release Authorization form for one (5%) of the 20 participants sampled.
- Follow-up with the participants on a quarterly basis after the participants exited the program for one (5%) of the 20 participants sampled.

In addition, in FY 2006-07, Career Partners - El Monte provided \$100 incentives to four (20%) of the 20 participants sampled prior to the individuals' actual enrollment into the WIA Youth program or development of their ISS plans. According to WIA guidelines, an incentive is a reward for achieving pre-determined measurable performance benchmark, as documented in the ISS plan. The unallowable incentives totaled \$400. This finding was also noted during the prior year's monitoring review.

Subsequent to our review, Career Partners - El Monte updated the JTA system to accurately reflect the program activities for seven of the nine participants and provided the signed Certification and Release Authorization form and additional documentation to show that a quarterly follow-up was provided for the one participant. Career Partners - El Monte also provided additional documentation to support that the ISS plans were discussed with the participants on a monthly basis for all four participants.

Recommendations

Career Partners - El Monte management:

- 3. Repay DCSS \$400 and review all incentives provided to ensure that the incentives are allowable expenditures.
- 4. Ensure that incentives are provided to eligible participants enrolled in the program and participants who achieve pre-determined measurable performance benchmarks as documented in their ISS plans.
- 5. Ensure that staff discuss the ISS plans with the participants on a monthly basis and documentation to support their discussions in the participants' case files.
- 6. Ensure that staff accurately updates the JTA system to reflect the participants' program activities within 30 days of the program activities.
- 7. Ensure that staff maintain signed Certification and Release Authorization forms in the participants' case files.
- 8. Ensure that staff follow-up with exited participants on a quarterly basis and maintain documentation to support the follow-up discussions in the participants' case files.

PERFORMANCE OUTCOMES

Objective

Determine whether Career Partners - El Monte met the planned performance measures as outlined in the County contract and accurately reported the performance outcomes to the Workforce Investment Board (WIB).

Verification

At the time of our review, the performance outcomes for Fiscal Year (FY) 2007-08 were not available. As such, we compared the reported FY 2006-07 actual performance outcomes to the planned performance measures outlined in the County contract and to the program activities reported on the JTA system. We also reviewed the documentation contained in the case files for 12 (17%) of the 72 participants reported as having exited the program, completed training and/or placed in employment during FY 2006-07.

Results

Generally, Career Partners - El Monte's FY 2006-07 actual performance outcomes were accurately reported to the WIB. However, Career Partners - El Monte did not meet all the performance measures outlined in the County contract. Specifically, Career Partners - El Monte planned to successfully exit 142 participants from the program. However, only 72 (51%) participants were successfully exited from the program. The County contract requires all contractors to obtain at least 85% of the planned performance outcomes.

During our review of the participants' case files, the same deficiencies reported in the billed services/client verification section above were noted. In addition, we noted that Career Partners - El Monte did not comply with the following WIA and County contract guidelines. Specifically, Career Partners - El Monte did not:

- Complete the ISS Plans as required by WIA guidelines for three (25%) of the 12 participants sampled.
- Provide leadership training within one year of the participants exiting the program for two (17%) of the 12 participants sampled.
- Maintain valid work permits in the participants' case files for one (8%) of the 12 participants sampled.

Subsequent to our review, Career Partners - El Monte provided completed ISS plans for the three participants and a valid work permit for the one participant.

Recommendations

Career Partners - El Monte management:

- 9. Ensure that performance measures outlined in the County contract are met.
- 10. Ensure that staff complete the ISS plans in accordance with WIA guidelines.
- 11. Ensure that leadership training is provided to the participants during enrollment or within one year of the participants exiting the program as required by the WIA guidelines.
- 12. Ensure that staff maintain valid work permits in the participants' case files.

CASH/REVENUE

Objective

Determine whether cash receipts and revenue are properly recorded in the Agency's records and deposited timely in their bank account. In addition, determine whether there are adequate controls over cash, petty cash and other liquid assets.

Verification

We interviewed Agency personnel and reviewed financial records. We also reviewed the Agency's December 2007 bank reconciliation.

Results

Career Partners - El Monte maintained adequate controls to ensure that revenue was properly recorded and deposited in a timely manner.

Recommendation

There are no recommendations for this section.

EXPENDITURES/PROCUREMENT

Objective

Determine whether program related expenditures were allowable under the County contract, properly documented and accurately billed.

Verification

We interviewed Agency personnel, reviewed financial records and reviewed documentation for 25 non-payroll expenditure transactions billed by the Agency for July and August 2007, totaling \$14,066.

Results

Career Partners - El Monte's expenditures were allowable, accurately billed and supported by documentation as required.

Recommendation

There are no recommendations for this section.

ADMINISTRATIVE CONTROLS/CONTRACT COMPLIANCE

Objective

Determine whether the Agency maintained sufficient controls over its business operations. In addition, determine whether the Agency is in compliance with other program and administrative requirements.

Verification

We interviewed Agency personnel, reviewed their policies and procedures manuals, conducted an on-site visit and tested transactions in various areas such as expenditures, payroll and personnel.

Results

Generally, Career Partners - El Monte maintained sufficient internal controls over its business operations and complied with other program and administrative requirements. However, Career Partners - El Monte did not obtain a fire inspection for the leased program facility.

Subsequent to our review, Career Partners - El Monte performed a fire inspection on June 20, 2008.

Recommendation

13. Career Partners - El Monte management ensure that a fire inspection is performed as required.

FIXED ASSETS AND EQUIPMENT

Objective

Determine whether Career Partners - El Monte's fixed assets and equipment purchases made with WIA funds are used for the WIA programs and are adequately safeguarded.

Verification

We interviewed Agency personnel and reviewed the Agency's fixed assets and equipment inventory listing. In addition, we performed an inventory and reviewed the usage of 50 items purchased with WIA funds, totaling \$31,253.

Results

Career Partners - El Monte used the equipment purchased with WIA funds for the WIA programs and the assets were safeguarded. However, Career Partners - El Monte's equipment inventory listing did not accurately reflect the locations of 13 (26%) of the 50 items sampled. The listing also did not include serial or identification numbers for 10 (20%) of the 50 items sampled.

Subsequent to our review, Career Partners - El Monte provided an updated fixed assets and equipment inventory listing that accurately reflected the location and identification numbers of the Agency's inventory.

Recommendation

14. Career Partners - El Monte management regularly update the fixed assets and equipment inventory listing to accurately reflect the locations of the equipment and identification numbers.

PAYROLL AND PERSONNEL

Objective

Determine whether payroll expenditures were appropriately charged to the WIA programs. In addition, determine whether personnel files were maintained as required.

Verification

We traced the payroll expenditures invoiced for 14 employees and 55 participants totaling \$40, 946 for August and November 2007 to the Agency's payroll records and time reports. We also interviewed two employees and reviewed the personnel files for four employees assigned to the WIA programs.

Results

Career Partners - El Monte appropriately charged payroll expenditures to the WIA programs. In addition, Career Partners - El Monte's personnel files were maintained as required.

Recommendation

There are no recommendations for this section.

COST ALLOCATION PLAN

Objective

Determine whether Career Partners - El Monte's Cost Allocation Plan was prepared in compliance with the County contract and the Agency used the plan to appropriately allocate shared program expenditures.

Verification

We reviewed Career Partners - El Monte's Cost Allocation Plan and reviewed a sample of expenditures incurred by the Agency in July and August 2007 to ensure that the expenditures were properly allocated to the Agency's programs.

<u>Results</u>

Career Partners - El Monte's Cost Allocation Plan was prepared in compliance with the County contract and costs were appropriately allocated.

Recommendation

There are no recommendations for this section.

CLOSE-OUT REVIEW

Objective

Determine whether the Agency's FY 2006-07 final close-out invoices for the WIA Youth and Foster Youth Programs reconciled to the Agency's financial accounting records.

Verification

We traced the Agency's FY 2006-07 general ledgers to the Agency's final close-out invoices for FY 2006-07. We also reviewed a sample of expenditures incurred in May and June 2007.

Results

Career Partners - El Monte's final close-out invoices reconciled to the Agency's financial records. However, Career Partners - El Monte billed CSS \$9,105 in unsupported and unallowable expenditures. Specifically, Career Partners - El Monte billed CSS:

- \$1,322 in expenditures related to another WIA program contract. Specifically, Career Partners has two separate contracts with CSS, Career Partners El Monte and Rosemead. Career Partners inappropriately billed \$1,322 in Rosemead's expenditures to the Career Partners El Monte's contract.
- \$427 in FY 2007-08 expenditures in FY 2006-07. According to the County contract, expenditures may not be charged to CSS if they incurred prior to the effective date of the contract or subsequent to the contract termination date.
- \$7,356 in expenditures not budgeted in their County contract.

Subsequent to our review, Career Partners - El Monte repaid CSS the \$9,105.

Recommendations

Career Partners - El Monte management:

- 15. Accurately bill CSS.
- 16. Ensure that the expenditures were budgeted in the County contract and if not budgeted, submit a budget modification to CSS.

PRIOR YEAR FOLLOW-UP

Objective

Determine the status of the recommendations reported in the prior monitoring review completed by the Auditor-Controller.

Verification

We verified whether the outstanding recommendations from the FY 2006-07 monitoring review were implemented. The report was issued on October 9, 2007.

Results

The prior year's monitoring report contained six recommendations. Career Partners - El Monte implemented four recommendations. As previously indicated, the finding related to recommendations 4 and 6 contained in this report were also noted during the prior

year's monitoring review. Career Partners - El Monte management stated they will implement the outstanding recommendations during FY 2008-09.

Recommendation

17. Career Partners - El Monte management implement the outstanding recommendations.

www.careerpartners.org



June 23, 2008

Wendy L. Watanabe, Acting Auditor-Controller Department of Auditor-Controller Countywide Contract Monitoring Division 1000 S. Fremont Avenue, Unit #51 Alhambra, CA 91803

ATTEN: YOON BAE

RE: FY 2007-2008 Fiscal and Administrative contract review of West San Gabriel Valley Consortium dba Career Partners- (El Monte) Workforce Investment Act (WIA) Programs provider.

Dear Ms. Watanabe:

We are submitting a reply to the draft monitoring report received by e-mail on June 16, 2008. West San Gabriel Valley Consortium dba Career Partners has reviewed the findings, which are identified in the report, and we will initiate procedures to make the necessary adjustments.

The enclosed documents illustrate the corrective actions we have taken in response to the findings.

If you have any questions or need additional clarification, please call Raymond L. Gibbs at 626-569-1100 or Lina Hsiung at 626-569-1102.

Sincerely,

Raymond L. Gibbs Executive Director

Raymond Lilbs

RLG/gd Enclosures

cc: Lina Hsiung

Jackie Sakane @ Community and Senior Services County of Los Angeles

www.careerpartners.org



June 18, 2008

Wendy L. Watanabe
Acting Auditor-Controller
Department of Auditor-Controller
Countywide Contract Monitoring Division
1000 S. Freemont Avenue Unit #51
Alhambra CA. 91803
Attn: Yoon Bae

ELIGIBILITY

Recommendations

El Monte management:

- 1. Repay CSS \$1,965 (\$11,495 \$9,530) and any other cost incurred on behalf of ineligible participant.
- 2. Ensure that staff obtain appropriate documentation from participants to determine the participants' eligibility for program services prior to enrollment.

Response:

Verification of additional barrier (6th barrier) was provided at the time of monitoring visit along with participant case notes where the Case Manager assessed and determined the 6th barrier.

El Monte Management disagrees with recommendation and will work with CSS to resolve finding.

BILLED SERVICES/CLIENT VERIFCATION

Recommendations

El Monte management:

3. Repay DCSS \$400 and review all incentives provided to ensure that the incentives are allowable expenditures.

Response:

Management will repay DCSS \$400.00. Although it was a monitoring visit from 2007/2008, the file reviewed was from 2006/2007. In the 2006/2007 monitoring review it was recommended that we change our Incentive Policy, upon the completion of the review Career Partners did change the Incentive Policy and has implemented the policy to ensure that all incentives are allowable expenditures.

- 4. Ensure that incentives are provided to eligible participants enrolled in the program and participants who achieve pre-determined measurable performance benchmarks as documented in their ISS plans.

 Career Partners will ensure that incentives are provided to eligible participants enrolled in the program. Career Partner's changed Incentive Policy after the 2006/2007 monitoring review.
- 5. Ensure that staff discuss the ISS plans with the participant on a monthly basis and documentation to support their discussions in the participants' case files.

All case files were immediately updated and all discussions were immediately documented in ISS plans. Staff will ensure immediately that all ISS plans are maintained on a monthly basis.

- 6. Ensure that staff accurately updates the JTA system to reflect the participants' program activities within 30 days of the program activities. Staff is currently working with LA County CSS to update the JTA system. Staff will ensure immediately that all program activities are reported to the JTA system in a timely manner.
- 7. Ensure that staff maintain signed Certification and Release Authorization forms in participants' case files.

Staff ensured that all Certification and Release Authorization forms were signed upon the completion of the review. Staff will ensure immediately that all forms are signed at all times.

8. Ensure that staff follow up with exited participants on a quarterly basis and documentation to support the follow-up discussions in the participants' case files.

Staff has immediately reviewed all follow-ups and will be turning in all follow ups. Staff will ensure immediately that all follow ups are done in a timely manner.

PERFORMANCE OUTCOMES

Recommendations

El Monte management:

- 9. Ensure that performance measures outlined in the County Contract are met. Career Partners completed the performance matrix in the contract, with regards to common measures. Career Partners planned to enroll a majority of High School Seniors in the WIA program with planned exits by June 30, 2007. Unfortunately we were unable to recruit a majority of eligible seniors and resorted to enrolling sophomores and juniors which did not allow for exits in the 4th quarter of 2007.
- 10. Ensure that staff complete the ISS plans in accordance with WIA guidelines. Staff will ensure immediately that the ISS plans are completed in accordance with the WIA guidelines.
- 11. Ensure that leadership training is provided to the participants during enrollment or within one year of the participants exiting the program as required by the WIA guidelines.

 Staff will ensure immediately that all Leadership activities are provided to participants within one year of their exit date.
- 12. Ensure that staff maintain valid work permits in the participants' case files. Staff will ensure immediately that all work permits are signed and valid.

If you have any questions regarding this letter please feel free to contact me at (626) 569-1106.

Sincerely,

Johnene Ornelas-Leyba Program Operations Director

WorkSource California Career Partners

www.careerpartners.org



June 23, 2008

Yoon Bae Principle Accountant-Auditor Department of Auditor-Controller

West San Gabriel Valley Consortium dba Career Partners - El Monte

Recommendation - page 6:

13. El Monte management obtain a fire inspection.

A fire inspection was completed May 10, 2008 per the building management. See attached letter and official fire inspection.

(El Monte Youth facility will vacate effective September 30, 2008).

Thank you for your review and recommendation with regards to the monitoring visit. Your input was greatly appreciated. If you have any questions please call me at 626-569-1101.

Sincerely,

Gloria Delgado

J. Delga. Lo

Administrative Services Manager WorkSource California Career Partners

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06/20/2008 14.27

FIRE DEPARTMENT ENG. CO. LOLO
1320 N. EASTERN AVENUE, LOS ANGELES, CALIFORNIA 90063-3294
OFFICIAL INSPECTION REPORT
ADDRESS 11100 VAILEY P. E. Monte DATE 6/20/08
OCCUPANCY CONSTRUCTION AREA
SPRINKLERED YES NO NUMBER OF STORIES
THE ITEMS LIEVED BELOW ARE VIOLATIONS OF THE STATE HEALTH AND SAFETY CODE . L. A. COUNTY FIRE CODE TITLE 32 CITY OF DAYS TO AVOID SUBSEQUENT ACTION.
REASONABLE FIRE SAFETY EXISTS AT THIS TIME
NO VIOLATIONS-RUMA
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FOR FURTHER INFORMATION CALL:
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June 23, 2008

To: Yoon Bae, CPA Senior Accountant-Auditor Department of Auditor-Controller

West San Gabriel Valley Consortium-El Monte Youth

Recommendation- Page 7:

14. El Monte management regularly update the fixed assets and equipment inventory listing to accurately reflect the location and identification numbers.

Response

Career Partners Management will maintain accurate updated inventory records on an annual basis.

Recommendation Page 9:

El Monte Management:

- 15. Accurately bill CSS.
- 16. Ensure that the expenditures were budgeted in the County contract and if not budgeted, submit a budget modification to CSS.

Response

- 15. Management will ensure accurate billing to CSS.
- 16. Management will be sure to submit a budget modification to CSS within the timeframe.